

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	

To: The Wireline Competition Bureau

COMMENTS OF YADKIN VALLEY TELEPHONE MEMBERSHIP CORPORATION

Yadkin Valley Telephone Membership Corporation (“YVTMC”) hereby submits the following in response to the recent *Public Notices* issued by the Wireline Competition Bureau requesting comment on certain census blocks shown as unserved on the National Broadband Map (“NBM”) for potential Connect America Fund (“CAF”) Phase I incremental support.¹ YVTMC is a rural incumbent local exchange carrier serving Alexander, Davie, Iredell, Rowan, Wilkes and Yadkin Counties in the foothills of North Carolina. YVTMC provides both DSL and Fiber-To-The-Home (“FTTH”) services throughout its service area featuring fixed broadband speeds up to 25 Mbps download and 2 Mbps upload. Upon review of the census block data and map, YVTMC has found a number of blocks identified by the Federal Communications Commission’s (“FCC” or “Commission”) NBM as being completely unserved by fixed terrestrial broadband service with advertised speeds of 3 Mbps downstream and 768 kbps upstream are actually served with Fiber-To-The-Home (“FTTH”) by YVTMC.

Specifically, YVTMC compared the Commission’s NBM data against its own broadband coverage data as well as data provided by YVTMC to the North Carolina Department of Commerce to

¹ See Wireline Competition Bureau Seeks Comment on Areas Shown as Unserved on the National Broadband Map for Connect America Phase I Incremental Support, WC Docket No. 10-90, Public Notice, DA 12-1961 (rel. December 5, 2012) (“*December 5 Public Notice*”).

populate the North Carolina Broadband Map. As identified in the attachment to this letter, YVTMC has found that the data reflected in the Commission's current version of the NBM using December 2011 data understates broadband in at least 2 census blocks located in Rowan County in North Carolina. YVTMC does indeed provide broadband service in these census blocks identified by the Commission as underserved by providing not only the minimum required broadband speed threshold, but exceeds such thresholds by providing Advertised Maximum Download of 25Mbps and Advertised Maximum Upload of 2 Mbps through FTTH. YVTMC respectfully requests these census blocks be removed from the list of unserved census blocks for purposes of determining CAF Phase I incremental support.

Respectfully submitted,

Yadkin Valley Telephone Membership Corporation

A handwritten signature in cursive script that reads "Mitzie Branon" followed by a horizontal line.

Mitzie Branon, Chief Executive Officer

February 11, 2013

Attachment

Attachment A

Census Block 371590519012013 in Rowan County, North Carolina is incorrectly listed as a price cap territory and completely unserved. This census block is within the YVTMC service area and is served with fixed broadband at speeds up to 25 Mbps down and 2 Mbps up.

Census Block 371590519012014 in Rowan County, North Carolina is incorrectly listed as a price cap territory and completely unserved. This census block is within the YVTMC service area and is served with fixed broadband at speeds up to 25 Mbps down and 2 Mbps up.